

FEB 12 2004
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

04 CV 10294 DPW

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, On Behalf of Herself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10294-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10308-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,	:	
Defendants.	:	

**AFFIDAVIT OF RICHARD A. SPEIRS IN SUPPORT OF MOTION
OF PLAINTIFF SAVERIO PUGLIESE FOR CONSOLIDATION AND FOR
APPOINTMENT OF LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON
COUNSEL**

MICHELLE TREBITSCH, On Behalf of Herself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10307-DPW
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10309-DPW
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10310-DPW
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	

RICHARD CURTIS, on Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10314-MLW
Plaintiff,	:	Hon. Mark L. Wolf
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
RONALD KASSOVER, on Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10329-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
STEVE L. BAKER, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10333-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	

MICHAEL KAFFEY, on Behalf of Himself and All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10345-DPW Hon. Douglas P. Woodlock
HAIMING HU, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10346-DPW Hon. Douglas P. Woodlock
CHARLES STARBUCK, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10362-DPW Hon. Douglas P. Woodlock

SAMUEL HO, Individually and on Behalf of All Others Similarly Situated, Plaintiff v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10363-DPW Hon. Douglas P. Woodlock
JEFFREY C. RODRIGUES, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10364-DPW Hon. Douglas P. Woodlock
ROBERT CONTE and MARK RESPLER, On Behalf of Themselves and all Others Similarly Situated, Plaintiff v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10382-DPW Hon. Douglas P. Woodlock

WHEATON ELECTRICAL SERVICES RETIREMENT 401K PROFIT SHARING, On Behalf of Itself and All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10383-DPW Hon. Douglas P. Woodlock :
BRIAN CLARK, On Behalf of Himself and All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10454-DPW Hon. Douglas P. Woodlock :
SHEILA BROWNWELL, On Behalf of Herself and All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10597-DPW Hon. Douglas P. Woodlock :
SAVERIO PUGLIESE, On Behalf of Himself and All Others Similarly Situated, Plaintiff,	:	Civil Action No. 04-CV-10612-DPW Hon. Douglas P. Woodlock :

v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
DAVID V. NOCITO, On Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10623-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	

STATE OF NEW YORK)
)
) ss
COUNTY OF NEW YORK)

I, Richard A. Speirs, being duly sworn, depose and say:

1. I am a member of the firm of Zwerling, Schachter & Zwerling, LLP (the "Zwerling Firm"), one of the attorneys for Saverio Pugliese. I am fully familiar with all the facts and circumstances herein.

2. This affidavit is submitted in support of the motion of Saverio Pugliese pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, and Section 21(a)(3)(B) of the Securities Exchange Act of 1934 as amended by the Private Securities Litigation Reform Act of 1995, for consolidation and for appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel in the above-captioned actions.

3. Attached hereto as Exhibit A is a true and correct copy of the complaint filed in the action *Pugliese, et al. v. Sonus Networks, Inc., et al.*, No. 04-CV-10612-DPW (filed March 30, 2004).

4. Attached hereto as Exhibit B is the Certification of Saverio Pugliese in Support of Motion for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel.

5. Attached hereto as Exhibit C is a true and correct copy of the first notice of a class action relating to Sonus Networks, Inc. ("Sonus"), dated February 12, 2004, issued by Cauley Geller Bowman & Rudman, LLP.

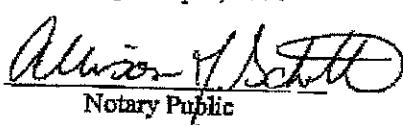
6. Attached hereto as Exhibit D is a firm resume of the Zwerling Firm, Pugliese's choice for Lead Counsel.

7. Attached hereto as Exhibit E is a firm resume of Berman DeValerio Pease Tabacco Burt & Pucillo, Pugliese's choice for Liaison Counsel.



Richard A. Spears

Sworn to before me this
12th day of April, 2004



Notary Public

ALLISON J. SCHOTT
Notary Public, State Of New York
No. 01SC6087635
Qualified In Queens County
Commission Expires Feb. 18, 2007